PROJECT 333-001

STORAGE FACILITY
PERMIT APPLICATION
SAFETY-KLEEN CORP. SERVICE CENTER
FARMINGTON, NEW MEXICO
NMD 980698849

Prepared for Safety-Kleen Systems, Inc.
By:
TriHydro Corporation
920 Sheridan Street
Laramie, Wyoming 82070

Original Permit Application:	September 14, 1987
Revised:	June 11, 1990
Revised:	October 25, 1990
Revised:	May 1994
Permit Renewal Application	October 4, 2000

CERTIFICATION STATEMENT
Farmington, New Mexico Service Center
NMD 980698849

The undersigned, being an authorized representative of Safety-Kleen Systems, Inc. the permit applicant, certifies under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

_____ _____

Mike Crawford Date
Branch Manager

ATTESTATION

The undersigned, attesting witness to the Certification Statement and this document dated, October 4, 2000, of which this affidavit is a part, states that I am personally responsible for the preparation of the document, that I personally gathered the information contained herein, and further that the information, to the best of my knowledge and belief, is true, accurate and complete.

_____ _____

Dan Czecholinski Date
Environmental Compliance Manager

TABLE OF CONTENTS

1.0 FACILITY DESCRIPTION

ABSTRACT

CORPORATE HEADQUARTERS:	Safety-Kleen Systems, Inc. 1301 Gervais Street Columbia, SC 29201 (803) 933-4200
RESPONSIBLE OFFICIALS:	Mike Crawford Branch Manager
FACILITY ADDRESS:	Safety-Kleen Systems, Inc. (7-008-21) 4210 A Hawkins Road Farmington, New Mexico 87401
TELEPHONE NUMBER:	(505) 327-9070
U.S. EPA I.D. NUMBER:	NMD 980698849
GEOGRAPHIC LOCATION:	36° 44' 20" N 108° 14' 11" W
OWNER:	COMET Corporation 1215 Brentwood Circle Farmington, New Mexico 87401 (303) 884-2602 (505) 325-3743 (June 1992)
DATE OPERATIONS BEGAN:	January 1, 1981
DESCRIPTION OF ACTIVITIES:	This facility is an accumulation point for spent solvents generated by Safety-Kleen customers, the majority of whom are small quantity generators. All wastes are ultimately shipped to a Safety-Kleen recycling facility or a contract reclaimer and then returned to the Company's customers as product.
PROPERTY DESCRIPTION:	0.80 acres with the following structures:

a. one building with offices and a warehouse for container storage;
b. two aboveground storage tanks (one for product and one for spent solvent) with concrete diking; and
c. one loading dock with a solvent return and fill station.

FACILITY TYPE: Storage in an aboveground tank (S02) and in containers (S01)

STORAGE UNIT	CAPACITY (GAL.)	SECONDARY CONTAINMENT (GAL.)	MATERIAL TO BE STORED
Tank	12,000	18,266	Spent Solvent (D001)[1]
Container Storage	3,820	382	Spent Immersion Cleaner[1]
			Dry Cleaning Waste (F002)[1]
			Sediment from Tank Bottoms or Ancillary Equipment [1]
			Aqueous Parts Washer Solvents [1]
			Paint Wastes (D001, F002, F005)[1]
			Photo Imaging Wastes (D011)[2]

Notes: [1] Waste may also include the following waste codes: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043

[2] Photo imaging wastes may not be considered a hazardous or solid waste if the hazardous constituent (silver) is reclaimed.

1.0 FACILITY DESCRIPTION

1.1. Description Of Business Activity

Safety-Kleen Systems, Inc. is an international service-oriented company whose customers are primarily engaged in automotive repair, industrial maintenance and dry cleaning. The company has been operating since 1968 offering solvent collection and reclamation services for its customers, more than 99% of whom generate less than 1000 kilograms (2200 pounds) per month.

Currently, Safety-Kleen offers several services, which involve the accumulation and storage of spent solvent at the Farmington Service Center. These wastes are shipped from the service center to a Safety-Kleen recycle center or to an independent reclaimer and are then returned to customers as usable product. A unique feature of this system is that Safety-Kleen retains ownership of the parts cleaning machines and the solvent. This "closed loop" system allows the Company to maintain control of the solvent except while it is in use at the customer's place of business. A description of typical services Safety-Kleen provides its customers is provided.

1.1.1 Parts Cleaner Service

The original service offered by the Company in 1968 was the parts cleaner service and it remains the primary business activity. This service involves the leasing of a small parts degreasing unit which consists of a sink affixed to a DOT-approved container (typically a 16- or 30 gallon drum) that contains Safety-Kleen Parts Washer Solvent. On a regularly scheduled basis, a Safety-Kleen sales representative cleans and inspects the parts washer machine and replaces the container of used solvent with one of clean product. Each sales representative performs about fifteen of these services per day, collecting the containers of used solvent on a route van.

At the end of each day, the solvent is transferred from the drums to a storage tank at the service center and containers of product are prepared for the next day's services. Periodically, a tanker truck is dispatched from one of the recycle centers to deliver a load of clean solvent and collect the spent solvent at the service center. Two-thirds of the solvent used by Safety-Kleen customers has been reclaimed with the remainder being purchased from a vendor.

Spent material is poured into the dumpster/drum washer in the return and fill station. It is then pumped into the used parts washer solvent storage tank. The sediment which accumulates in the bottom of the dumpster/drum washer is removed manually, drummed and stored in the return and fill station according to the satellite accumulation requirements of 40 CFR 262.34(b). The drummed sediment is manifested off-site prior to the expiration of the 90-day time frame for accumulation of hazardous waste.

Safety-Kleen has also established a parts cleaner service for users who own their machines. This service, known as the Customer Owned Machine Service, provides a solvent reclamation service to these customers regardless of machine model. The used solvent is pumped (using a hand pump) from the customer owned machine to a standard Safety-Kleen container which

meets DOT requirements (typically a 16 or thirty gallon container) by a Safety-Kleen sales representative. The waste solvent is stored in the same manner as the waste solvent collected from the leased parts cleaner machines. The sales representative then refills the customer-owned machine with Safety-Kleen parts washer solvent.

A second type of parts washer, the immersion cleaner, is available for the removal of varnish and gum from such things as carburetors and transmissions. This machine consists of an immersible basket with an agitator affixed to a DOT-approved container (typically a 16 gallon drum). The immersion cleaner is non-halogenated hydrocarbon mixture. The spent solvent remains in the drum after delivery to the service center where it is stored in a contained area of the warehouse. Periodically, a box trailer truck is dispatched from a recycle center to deliver containers of fresh solvent and collect the containers of spent immersion cleaner solvent for reclamation.

1.1.2 Dry Cleaner Service

In 1984, Safety-Kleen began offering a service for the collection of filter cartridges and still bottoms contaminated with dry cleaning solvents (usually perchloroethylene). These wastes are containerized on the customer's premises and are periodically collected by a sales representative. The containerized waste is accumulated in the container storage area prior to shipment to a Safety-Kleen recycle center contract reclaimer or other permitted facility. About 35% of this waste is returned to dry cleaners as usable product.

1.1.3 Paint Waste Collection Service

In 1986, a paint waste reclamation program was initiated to service automobile body repair businesses. Waste containing various thinners and paints are collected in DOT-approved containers on the customer’s premises. The sales representative collects these containers and stores them in the container storage area of the warehouse. These wastes are periodically transported to a reclaimer and the regenerated solvent is distributed to Safety-Kleen customers for use as product.

1.1.4 Imaging/Photochemical Service

Imaging waste consists typically of three waste streams. Photo fixer solution is used to etch photo film during processing. This material is characteristic for silver (D011). Safety Kleen is able to recover the hazardous constituent from the photo fixer solution. Used photo developer is an aqueous solution used to neutralize the etching effects of the photo fixer. This material exhibits no hazardous characteristics but may not be discharged into public wastewater treatment system in some communities. Silver collection canisters are sent to a recycle center for silver reclamation. These canisters do not meet the definition of a solid waste per 40 CFR 260.30(c) and are managed as a non-regulated material.

The Imaging/Photochemical wastes are placed in containers at the customer’s place of business. Several of these wastes are not considered hazardous or solid wastes because the hazardous constituent may be reclaimed. However, the sales representative collects these containers and stores them in the container storage area of the warehouse. The

imaging/photochemical wastes are then re-manifested and periodically sent to a Safety-Kleen recycle center, contract reclaimer or other permitted treatment facility.

1.2 Description Of The Facility

The Farmington service center has been operating as a storage facility since January 1, 1981. The facility consists of the following structures:

a 1,530 square foot warehouse with offices and a container storage area;

b. two nominal 12,000 gallon aboveground storage tanks, with diking used for storage of product and waste solvents; and

c. a solvent return and fill station with a loading dock, wet dumpster, drum washer (non-regulated, continued use unit), and secondary containment.

Descriptions of the surrounding area and of waste management practices at the service center follow. Applicable maps and facility drawings are in Attachment E.

1.2.1 Regional Description

The Farmington Service Center is located 600 feet northeast of the intersection of Troy King Road and West Main Street (U.S. Hwy 550) in San Juan County. This area is zoned industrial and to the best of Safety-Kleen's knowledge, no easements, title, deed, or usage restrictions exist which may conflict with operations at this site.

The western part of San Juan County is the Navajo Indian reservation. Eastern San Juan County, the location of Farmington, has a total area of 2,182,520 acres or 3,410 square miles. The total population of the area is approximately 50,000 with about 34,000 in Farmington. The major industries in Farmington are involved in the development of gas, oil and coal resources. Abundant rangeland contributed to the growth of the area through cattle raising and farming, however, this industry has largely declined.

Farmington has a continental climate with an average annual precipitation of 6 inches and total annual snowfall of 9 inches. The average temperature in winter is 44^{o} F and the average summer temperature is 71^{o} F. The average daily temperature range is 33 degrees. An average of 40 thunderstorms occur each year and prevailing winds are east-west.

San Juan County is in the San Juan Basin part of the Navajo section of the Colorado Plateau physiographic province. This area is a structural depression containing deep Tertiary till on rocks of late Cretaceous age. Farmington is located in the alluvial fan in the entrenched San Juan and Animas Rivers. The service center is not in the flood plain of either river. The elevation at the site is 5,470 feet above sea level. The San Juan River provides the principal drainage route for the area and the Animas River is its main tributary.

The soil in the area of the service center is the Avalon sandy loam. This is a deep well-drained soil on mesas and plateaus which formed in alluvial and eolian material derived from sandstone and shale. This soil is moderately permeable with slopes ranging from 5 to 8 percent.

The city of Farmington obtains its water primarily from the Animas River through two pump stations. Pump station 1 is located about two miles east of Farmington and pump station 2 and the Bee Line reservoir are several miles northeast of Farmington. Standby water is obtained from a pump station several miles south of Farmington on the San Juan River. The service center obtains water from the city of Farmington via a 6" water line on Hawkins Road. A drop inlet to the city storm sewer system is located approximately 500 feet west of the service center. Sewage is collected in a septic tank.

There are no known oil or gas wells within a mile of the service center. No parks, schools, wetlands, or critical habitats exist within one mile of the service center.

The non-building areas of the facility are paved with asphalt, concrete or gravel, as noted on the Site Plan in Attachment E. The majority of the vehicular traffic and loading/unloading operations occur at and near the return and fill station and this area is paved with asphalt and concrete. The entrance to the facility is on Hawkins Road which is the major access road to the facility. The access road was designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the industrial activities in this area. The route van that daily travels the routes between the service center and its customers uses the two-lane approach driveway. The trucks dispatched from the recycle center to deliver and pick up fresh and used solvents perform these activities at the aboveground tank area.

This permit application has been organized similar to the previous permit application to maintain consistency. The remaining sections of this permit application (Waste Analysis Plan, Preparedness, and Prevention Plan, etc.) are included in attachments A through H. Relevant information associated with each attachment is presented at the end of each respective attachment.

ATTACHMENT A

WASTE ANALYSIS PLAN

WASTE ANALYSIS PLAN

ABSTRACT

Waste Description	EPA Waste Code Nos.	Facility Annual Capacity[1]	Amount[2]
Spent Solvents	D001[3]	12,000	50
Bottom Sediment From the Tank and Ancillary Equipment	D001[3]	N/A	2
Spent Immersion Cleaner	D001[3]	4,464	3
Dry Cleaning Waste	D001, F002[3]		6
Paint Waste	F003, F005, D001[3]	4,464	
Photo Chemical Wastes	D011	4,464	

NOTES:
[1] The facility capacity is in gallons.
[2] The annual amount is in thousands of gallons.
[3] and may also include D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033 D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043
[4] The total amount of drummed waste stored in the warehouse will not exceed 3,820 gallons.

WASTE ANALYSIS PLAN

A.1 Description Of Wastes

Several types of waste representing core Safety-Kleen Products result from the servicing of Safety-Kleen customers and the maintenance of the service center. Analytical data for the wastes and specifications for the products are in Attachment A.1 and qualitative descriptions follow.

A.1.1 Wastes Resulting From the Parts Washer Service

Used solvents from parts washers is accumulated in a nominal 12,000 gallon aboveground storage tank via the return and fill station. Containers of spent material (typically 16- and 30-gallon containers) are poured into a drum washer/dumpster at the return and fill station which in turn empties into the tank. Five types of parts washer waste are generally produced as a result of the parts washer service.

a. Spent Solvent--The spent solvent is removed from the tank by a tanker truck on a scheduled basis. About 5,000 gallons are removed every month. This waste is ignitable (D001) and may exhibit the toxicity characteristic of D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043.

b. Bottom Sediment in the Tank--Periodically, it is necessary to remove sediment and other heavy material from the bottom of the tank. A Safety-Kleen vacuum truck is generally used for this purpose. The sediment is ignitable (D001) and may exhibit the toxicity characteristic of D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043.

c. Drum Washer/Dumpster sediment--Sediment also accumulates in the bottom of the drum washers/dumpsters in the return and fill station. This sediment is removed manually with a shovel, containerized and the containers are stored in the Container Storage Area of the warehouse. Containers are properly labeled to indicate their contents. The chemical composition of this waste is very similar to that of the bottom sediment from the tank and therefore, carries the same EPA hazardous waste codes.

d. Immersion Cleaner--remains in the container in which it was originally packaged and used until it is ultimately received at the recycle center. The immersion cleaner is a non-halogenated hydrocarbon mixture and may exhibit the toxicity characteristics of D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043. The containers are properly labeled, placed on pallets and are stacked no more than 2 pallets high in the CSA of the warehouse.

e. Aqueous Parts Cleaner Solvents: This waste may be placed into the used parts cleaner solvent tank as discussed above, bulked onsite in larger DOT approved containers and stored in the CSA, or remain in the container in which it was originally used. The aqueous parts cleaner may exhibit the toxicity characteristics of D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043.

A.1.2 Wastes Resulting From the Dry Cleaner Service

Dry cleaning wastes consist of spent filter cartridges, separator water powder residue from diatomaceous or other powder filter systems and still bottoms. These wastes are packaged on the customer's premises in containers which meet DOT requirements (typically black 16-, 30-, or split 30-gallon containers. The containers are then palletized, stacked two-high and placed in the container storage area of the warehouse. Approximately 90% of the dry cleaning solvent used is perchloroethylene (F002 and D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043) and 5% is trichloro-trifluoroethane (F002) and may exhibit the toxicity characteristics of D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043 and 5% is mineral spirits which would add the waste code D001. Other types of dry cleaning wastes (e.g. freon) will be managed on a transfer basis only.

Dry cleaner separator water is generated during the distilling of the used perchloroethylene. Perchloroethylene and water are separated during distilling. Separator water is typically less than 10 % perchloroethylene and is being handled as an F002 waste.

A.1.3 Paint Wastes

Paint wastes consist of various lacquer thinners (D001, F003, and F005) and paints. Paint wastes may also exhibit the toxic characteristics of D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043. The waste is collected in DOT-approved containers at the customer's place of business. The containers are then transported to the facility and stored in the container storage area of the warehouse.

A.1.4 Photographic/Imaging Wastes

Some photographic imaging wastes managed by the facility are not solid wastes per 40 CFR 261.2(c) because their hazardous constituent is reclaimed. Others are managed under the provisions of Subpart F of 40 CFR 266 – Recyclable Materials Utilized for Precious Metals Recovery. Imaging waste consists typically of three waste streams. Photo fixer solution is an aqueous solution used to etch photo film during processing. This material is characteristic for silver (D011). Safety-Kleen is able to recover the silver from the solution. Used Photo developer is an aqueous solution that exhibits no hazardous waste characteristics but may not be allowed to discharge into public wastewater treatment systems in some communities. Silver

collection canisters are sent to a recycle center for reclamation. These canisters do not meet the definition of a hazardous waste as per 40 CFR 260.30(c) and are managed as a non-regulated material.

A.2 Quality Control Procedures

The used solvents are the primary feed stocks for the generation of Safety-Kleen solvent products. As a result, quality control of the spent solvents is necessary to ensure that reclamation occurs in the safest and most efficient manner possible. The service center collects spent solvents from approximately 400 customers, most of whom are small quantity generators, and containers of recoverable solvents are returned to the service center for shipment to a reclaimer. With such large numbers of waste generators and waste shipments, performing detailed analyses at the service center is economically and logistically infeasible.

Furthermore, as discussed earlier in the Facility Description, the materials collected at the service center are managed at all times in the closed loop system and are usually collected from a company with a single process. The composition and quality of these materials are known and Safety-Kleen's operating experiences have shown that the collected materials rarely deviate from company specifications. As an additional safeguard, Safety-Kleen personnel are instructed to inspect all materials before returning them to the service centers. This mode of operation has been proven to safeguard the recycling process and maintain a quality product.

In accordance with HWMR 206.B.3, however, Safety-Kleen will perform physical and chemical analysis of a waste stream when it is notified or has reason to believe that the process or operation generating the waste has changed, or when the result of inspection indicates that the waste collected does not match that designated on the manifest or shipping documents. It is Safety-Kleen's practice that suspected non-conforming material must not be accepted until a full analysis has been done or the material must be rejected. Procedures to verify waste characteristics occur at several check points in the management of the solvent.

A.2.1 Parts Washer Service

Prior to leasing a parts cleaning machine, the customer's business activity is reviewed. Where the possibility exists for contamination of the parts washer solvents (e.g., pesticide, herbicide or pharmaceutical operations), the process is reviewed to insure that the solvent is protected from the potential sources of contamination.

Sales representatives are instructed to visually examine the spent solvents when the machines are serviced, noting the quantity, odor and appearance of the material recovered as follows:

a. The quantity of used solvent in the containers--Normally the 16-gallon containers of spent mineral spirits contains approximately nine gallons of liquid, the 30-gallon drum about nineteen gallons and the 16-gallon containers of spent immersion cleaner about four and one-half gallons. When the amount of liquid is substantially different from the expected quantity, an inquiry of the customer's operation and handling procedures is

made. Contingent on the customer's responses, the solvent is accepted or left with the customer until analysis is completed to determine its acceptability.

b. The odor of the liquid in the container--Should the odor of the liquid in the drum be different from that of the mineral spirits or immersion cleaner, the container is set aside for further action as described in item 'a'.

c. The appearance of the liquid in the container--The used mineral spirits should be greenish-brown in color and float on water. The immersion cleaner is a single-phase liquid, which is dark brown in color. Liquids in the containers which deviate from the above descriptions, or which contain substantial amounts of water, high density solvent and/or oil at the bottom should be set aside for further action as described in item 'a'.

At the service center, the sales representative or the warehouseman again observes the quantity, odor and appearance of the solvent prior to emptying the solvent into the wet drum washer. Containers with questionable contents are set aside and the customer is questioned. Pending their response, the drum is accepted, returned to the customer, or properly disposed of at the customer's expense. The immersion cleaner containers are never opened at the service center, so additional verification is not possible until it reaches the recycle center.

A.2.2 Dry Cleaner Waste Collection Service

The dry cleaning wastes are collected from facilities where one process is managed and the possibility of cross-contamination from other chemicals or wastes is minimal. The containers are picked up by the sales representative and delivered to the service center and stored in the container storage area. The containers are not reopened until they reach the recycle center.

A.2.3 Paint Wastes

Safety-Kleen handles both lacquer thinner waste generated from the paint gun cleaning process and paint waste.

a. Lacquer thinner waste: The significant criterion for determining whether lacquer thinner waste will be accepted is volume. The solvent is provided to customers in 5-gallon containers. The paint gun cleaning machine operates as a closed system whereby there should never be a combined volume of more than 7 ½ gallons of solvent in the containers. If a service representative discovers more than a total of 7 ½ gallons of solvent in the two containers, the waste will be rejected or sampled for analysis to determine its acceptability.

b. Paint Waste: Paint wastes are collected from the facilities where one process is managed and the possibility of cross contamination from other chemicals or wastes is minimal. The contents of the containers are verified by the sales representative when he or she services the customer and the containers are not reopened until they reach the recycle center.

A.2.4 Photographic/Imaging Waste

Photographic/imaging waste is collected from facilities where one process is managed and the possibility of cross contamination is minimal. The sales representative inspects the contents of the containers of photographic/imaging waste when the sales representative services the customer. The pH and silver content of the waste is checked at the time of service, and the waste is also inspected visually.

A.3 Waste Analyses At The Recycle Center

Analyses performed at the Safety-Kleen recycle centers are undertaken to safeguard the recycling process and to assure the product quality. Each waste stream is re-characterized on an annual basis. If a particular waste stream was not handled at the facility during the previous year, no re-characterization analysis of the waste will be performed. The following tables summarize a typical waste analysis plan practiced at the recycle centers for the hazardous materials returned from the Farmington service center:

Table A-1 Parameters and Rationale for Hazardous Waste Analyses
Table A-2 Parameters and Test Methods
Table A-3 Methods Used to Sample Hazardous Wastes
Table A-4 Frequency of Analysis

These tables are included at the end of this waste analysis plan.

A.4 Waste Analysis Plan Update

This waste analysis plan will be modified when a new waste product is collected or when sampling and material management methods change. Revisions to the waste analysis plan will be provided to the facility manager and training will be conducted for appropriate personnel.

A.5 Land Ban Notification/Certification Forms

In accordance with 40 CFR 268.7, Safety-Kleen will provide notification/certification for wastes banned from landfills as follows:

a. Printing the Notice language on the manifests - such as for core-business customers to branch shipments; or

b. Special forms for each regularly handled waste type (e.g., MS, IC, perc, freon); or

c. A general form that must be completed for unique or non-standard waste streams. These wastes will only be handled on a transfer basis, in accordance with 40 CFR 263.12.

The Notice is required paperwork for all Safety-Kleen waste types. Shipments lacking the proper Notice will not be accepted by any Safety-Kleen facility. When a shipment with the proper Notice is received, the Notice is kept in the files of the receiving facility with the manifest or with the pre-print if a manifest is not used.

A.6 Operating Log Record

Safety-Kleen maintains an operating log record on site which includes the following information as it becomes available:

1) A description and the quantity of each hazardous waste received, and the method and date of its storage as required by Pt. V. sec. 264, Appendix I;

2) The location of each hazardous waste within the facility and the quantity;

3) Records and results of waste analyses performed;

4) Summary reports and details of all incidents that require implementing the contingency plan;

5) Records and results of inspections;

6) Monitoring, testing or analytical data and corrective action where required;

7) For off-site facilities, Notices to generators as specified in 264.12(b);

8) All closure and post-closure cost estimates;

9) A certification by the permittee no less often than annually, that the permittee has a program in place to reduce the volume and toxicity of hazardous waste;

10) The land ban notices and requirements. These records are kept on file in the resource recovery (May 1994) branch manager's office.

A.7 Waste Determination for Subpart BB and CC Compliance

For purposes of waste determination, this facility utilizes knowledge of the wastes described in Section A.1, A.2 and A.3 above. For those hazardous wastes which are managed on a transfer basis, the Subpart CC regulation does not apply. However, the owner/operator may use knowledge of the waste based on information included in manifests, shipping papers, or waste

certification notices to confirm waste determination for the generator or the ultimate receiving facility.

Based upon this knowledge, it has been determined that all wastes managed in tanks or containers at this facility may display an average volatile organic concentration of greater than 500 ppmw at the point of waste origination. Documentation of this knowledge is provided in Attachment A.1 (waste characterization analytical results), as required in 40 CFR 264.1063(d) and 264.1083. Therefore, hazardous wastes managed in tanks or containers at this facility shall be managed in accordance with the applicable Subpart CC standards.

Table A-1

Parameters And Rationale For Hazardous Waste Analysis

Hazardous Waste	Parameter*	Rationale
1. Spent Solvents	Flash Point	Ignitable Characteristic (D001)
	TCLP	Contains components which exceed the limits listed in 40 CFR 261.24
2. Solvent Tank Bottoms	Same as number 1	Same as number 1
3. Used Immersion Cleaner	TCLP	Contains components which exceed the limits listed in 40 CFR 261.24
4. Dry Cleaning Wastes	Perchloroethylene, 1,1,2-trichloro-1,,2,2-trifluoroethane	Contains this ingredient (F002)
	TCLP	Contains components which exceed the limits listed in 40 CFR 261.24
	Flash Point	Ignitable Characteristic (D001)

Notes: TCLP = Toxicity Characteristic Leaching Procedure.

* **Earlier sample analyses indicated the parameters listed are the only ones of concern.**

Table A-2

Parameters And Test Methods

Parameter	Test Method	Reference
Flash Point	Setaflash closed cup tester	U.S. EPA SW 846, Third Ed., Method 1020 (ASTM Method D327-78) or an equivalent method.
Hydrocarbons, Volatile and Semivolatile Organic Compounds	Gas Chromatography (GC) and/or Mass Spectroscopy	U.S. EPA Methods 8010, 8015, 8020, 8120, 8240, and/or 8270 or equivalent methods.
Toxicity Characteristics	TCLP	40 CFR 261, Appendix II; 55 FR 11798 (March 29. 1990)

Table A-3

Methods To Sample Hazardous Wastes

Hazardous Waste	Reference for Sampling	Description of Sampling Method	Sampler
1. Spent Solvents	Sampling a tank "Samples & Sampling Procedures for Hazardous Waste Streams" EPA - 600/2-80-018	Test Methods for the Evaluation of Solid Waste Physical/ Chemical Methods, SW846, U.S. EPA Section 1.2.1.1	For tanks - Coliwasa Tube
2. Solvent Tank Bottoms	Same as number 1	Same as number 1	Same as number 1
3. Spent Immersion Cleaner	Same as number 3	Same as number 1	Same as number 3
4. Dry Cleaning Wastes	Same as number 3	Same as number 1	Same as number 3

Table A-4

Frequency of Analysis

Hazardous Waste	Analysis*	Frequency
1. Spent Solvents	Flash Point	At least annually
	TCLP	At least annually
2. Solvent Tank Bottoms	Flash Point	At least annually
	TCLP	At least annually
3. Used Immersion Cleaner	TCLP	At least annually
4. Dry Cleaning Wastes	Perchloroethylene, 1,1,2-trichloro-1,,2,2-trifluoroethane	At least annually
		At least annually
	TCLP	At least annually
	Flash Point	

Notes: TCLP = Toxicity Characteristic Leaching Procedure.

* **Past analyses have indicated the parameters listed are the only ones of concern.**

ATTACHMENT A.1

ANNUAL RECHARACTERIZATION DATA

ATTACHMENT B

SECURITY MEASURES

SECURITY MEASURES

The facility is secured with a six-foot high chain link fence topped by three strands of barbed wire. All access gates are locked when the facility is unoccupied. Warning signs in English, Navajo and Spanish are placed on all sides of the fence stating "Caution – Hazardous Waste Area – Unauthorized Personnel Keep Out" which are visible from twenty-five feet. In addition, outdoor lights are on sensoring devices that activate at low light conditions.

The office/warehouse building is secured with locks on all doors and warning signs are posted at all entrances to work and waste storage areas.

The tanks are enclosed in the secured, fenced area. The tank pump controls are outside the return and fill station. The pumps are not activated unless mineral spirits product or waste is being added to or removed from the tanks by Safety-Kleen personnel. The container storage area is also locked unless occupied by Safety-Kleen personnel. As a result the tanks and container storage area are accessible only by Safety-Kleen personnel. In addition, warning signs are posted on the return and fill station.

ATTACHMENT C

INSPECTION PLAN

INSPECTION PLAN

C.1 Inspection Procedures

The Service Center Manager (i.e., branch manager) or designate is responsible for carrying out and documenting the facility inspection) on a daily basis (workdays only typically Monday through Friday). Examples of these forms are in Attachment C.1. He/She must note any repairs that are needed and assure that they are completed. If the repairs cannot be implemented by onsite personnel, the Technical Services Department at Safety-Kleen's corporate headquarters must be notified for assistance. Completion of repairs must also be noted on the Facility Inspection Record.

The facility inspection typically includes the following:

a. Tank Inspections--At a minimum, the tanks holding the solvent product and spent solvent are inspected daily. The inspections include checks of the high level alarm and of the volume held in the tank. Sudden deviations in the tank volumes will be investigated and their causes determined. If necessary, repairs must be initiated immediately. When the tank used to store spent solvent is approximately 85% full, a pickup must be scheduled with Safety-Kleen's corporate dispatch department. The solvent must not exceed 95% of the tank volume at any time. The tanks are also inspected to comply with Subpart CC requirements.

   The secondary containment for the tanks must be checked for cracks or other deterioration. Any damage to tanks (such as rust or loose fixtures) or secondary containment must be noted and repairs initiated.

b. Solvent Dispensing Equipment--The solvent dispensing hose, connections and valves must be inspected for damage (such as cracks or leaks) and proper functioning on a daily basis. The pumps, pipes and fittings must also be checked daily for damage and proper functioning. Any damage to the solvent dispensing equipment must be noted and repaired. The parts washer solvent dispensing equipment is also inspected to comply with Subpart BB requirements.

c. Container Storage Area--The container storage area is inspected daily and the number and condition of the containers noted. The total volume of waste in the container storage area must not exceed ten times the amount that can be collected in the secondary containment system. The contents of any leaking or suspect containers must be placed in a container of adequate integrity. Finally, the containers must be properly labeled and marked in accordance with U.S. DOT and New Mexico hazardous waste regulations. The secondary containment system must be inspected for deterioration or failure. If cracks or leaks are detected, they must be repaired immediately. Containers are also inspected to comply with Subpart CC requirements.

d. Route Vehicles--The necessary safety equipment must be on board and may include: sorbants, fire extinguisher, eye wash, first aid kit, reflector kits, rubber gloves, plastic aprons, and safety glasses. Any missing equipment must be replaced.

e. Drum Washer/Dumpsters--The drum washers/dumpsters (in the return and fill station) must be inspected weekly for leaks and sediment buildup. Any leaks must be noted and repaired immediately and excess sediment must be removed.

f. Safety Equipment--The fire extinguishers must be checked weekly to insure that the units are charged and accessible. In addition, the operation of the eyewash must be confirmed weekly and the first aid kit and sorbents must be inspected weekly for adequate content and accessibility. A list of required emergency equipment is in Attachment E.

g. Security--The operation of each gate and lock must be checked daily. In addition, the fence must be inspected for deterioration on a weekly basis.

C.2 Subpart CC Compliance

Safety-Kleen has developed a Subpart CC Compliance Plan, which details procedures to achieve compliance with Subpart CC requirements. The plan includes provisions for an annual visual tank inspection of the waste solvent storage tank and vent system, as well as container inspections upon arrival at the facility and proper container management. A copy of the Subpart CC Compliance Plan is included in Attachment C.2.

C.3 Subpart BB Compliance

Safety-Kleen complies with Subpart BB requirements by inspecting the process piping and equipment. Each valve, joint, flange, pressure relief device, pump, etc. is inspected to insure the equipment is not leaking and is functioning properly. Open-ended pipes are capped when not in use. An equipment inventory for inspections (Attachment C.3) is used to document compliance with Subpart BB inspections, and as required by 40 CFR 270.25.

ATTACHMENT D

PERSONNEL TRAINING

PERSONNEL TRAINING

ABSTRACT

OBJECTIVE: The purpose of training is to familiarize employees with environmental regulations, records and emergency procedures so they can perform their jobs in the safest and most efficient manner possible. The program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems.

TIME OF TRAINING

Job Title	Prior to Starting Work	On The Job	Annually	When Regulations or Procedures Change
Branch Manager	X	X	X	X
Branch Secretary	X	X	X	X
Branch Sales Mgr	X	X	X	X
Sales Representative	X	X	X	X
Warehouse Person	X	X	X	X

PERSONNEL TRAINING

D.1 OUTLINE OF TRAINING PROGRAM

Each employee is trained to operate and maintain the facility safely, and to understand hazards unique to the job assignment. This section contains information on service center personnel and trainers, job descriptions, training outlines and training record forms. The training is designed to meet federal regulations and requirements. All employees at the facility have had training that satisfies the requirements of Pt. V, ' 264.16. The regional environmental professional directly assists with the training new branch managers. The branch manager, in turn, trains his employees. An employee may not work in an unsupervised position until he or she has received proper training as outlined in Attachment D.1.

D.2 Organization Structure and Job Descriptions

Environmental compliance and training of branch employees is the responsibility of the branch manager. The Safety-Kleen corporate office provides a training program to be executed annually. The training program is directed by personnel trained in hazardous waste management procedures and includes instruction on hazardous waste management for facility personnel in accordance with 40 CFR 264.16(a)(2). Job descriptions for branch personnel are in Appendix D.2. In accordance with 40 CFR 264.16(d)(1), a list of employees, their job titles, and job functions will be maintained at the facility.

D.2.1 Branch Manager

The branch manager (which may include the resource recovery manager, branch sales manager, branch automotive manager, etc., or designate) is ultimately responsible for the operations at the service center. The sales representatives, secretary and warehouseman report to the branch manager and he, in turn, must provide the training and materials necessary for the branch employees to execute their duties. With respect to environmental compliance, the branch manager must:

a. KEEP THE SERVICE CENTER CLEAN AND ORDERLY;

b. execute or designate an employee to execute the daily inspection, keep a written log and remediate any problems;

c. know the potential hazards of the material and wastes handled onsite;

d. identify potential spill and fire sources and be able to execute the contingency plan;

e. inform all employees of their environmental responsibilities;

f. act as emergency coordinator and notify the proper authorities during an emergency, remediate the situation to the best of his/her abilities, and submit necessary reports to the corporate office; and

g. maintain all environmental records (such as manifests, training records and spill reports) at the service center.

D.2.2 Corporate Compliance Department

Safety-Kleen's Corporate Compliance Department has personnel on staff who provide guidance to divisional and regional personnel for training, permitting, and other compliance issues for the service centers in a given geographic area of the country.

D.3 Description Of The Training Program

Employee training may be accomplished using classroom, videotape, written and on-the-job methods. The regional/corporate offices prepare a training program for employees, and documents that the program has been executed.

An employee is trained prior to starting or as soon as he/she begins working (depending on the specific position), and annually thereafter. Safety-Kleen ensures that the Branch Manager has received adequate training in order to train branch personnel. Attachment D.1 contains an example outline of the training program, which demonstrates that facility personnel are trained in Hazardous Waste Management procedures.

D.3.1 Training of New Branch Managers

New managers are trained for several weeks before they begin their new positions. This training includes onsite, on the job, and offsite classroom training. While being trained at a designated "training facility", a new manager reviews all environmental records and learns the record keeping requirements. These records may include Waste Analysis Profiles, manifests, personnel records, training records, facility inspection records, and spill reports.

The training culminates with additional training at his/her new facility at the direction of an environmental professional. This training may include at a minimum, a review of the facility permit, including the Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan and Closure Plan. Additional time is spent reviewing past environmental compliance at the branch manager's facility and regulations unique to his state are discussed as well.

D.3.2 Training of New Branch Secretaries

Branch secretaries are trained in the proper record keeping procedures as soon as they begin working for Safety-Kleen. While they are not usually responsible for preparing the documentation, they must check it for accuracy and completeness and then process or file it as required. Additional training is overseen by the branch manager and is done within six months of starting. It includes the items listed in the training outline (Attachment D.1).

D.3.3 Training of Sales Manager

A branch sales manager is a middle management position created to supervise the sales force within a specific line of services. The sales manager position will be particular to a specific line of Safety-Kleen business and will be filled according to the needs of the facility. The primary goal of this position is to direct and assist the branch manager in attaining sales goals in a specific line of business which Safety-Kleen offers. The sales manager supervises the sales aspect of the sales representative position. Though most training for this position is within the area of sales the sales manager also receives the training included in the training outline in Attachment D.1. A sales manager may also be trained as the designate for performing facility inspections. Additional training in the form of a review of the Contingency Plan with the branch manager is required. A job description for this position can be found in Attachment D.2.

D.3.4 Training of New Sales Representatives

New sales representatives are trained onsite during which they are introduced to manifests, facility inspection records and training records. A sales representative may also be trained as the designate for performing the facility inspection. The contingency plan must be reviewed with the branch manager before the sales representative formally begins his new position and annually thereafter. All items listed in the training outline (Attachment D.1) must be explained within six months of starting.

D.3.5 Training of New Warehousepersons

A warehouseperson is trained to maintain the service center and assist the other branch employees in their tasks. He/She may be a designate for the facility inspection and must be trained by the branch manager as such. Within two weeks of the warehouseperson's starting, the branch manager must review the contingency plan with the warehouseperson, and within six months must review the items listed in the training outline (Attachment D.1).

D.3.6 Annual Training

On an annual basis, employees are trained using a program prepared and updated annually by the Safety-Kleen Regional and/or Corporate Compliance Offices and Safety Department offices. The annual training includes updates on environmental regulations, an in-depth review of the contingency plan and a review of RCRA inspection criteria.

Service center employees must annually review the items listed in the Example Training Plan Outline. This review is in the form of slide/tape and/or videotapes and a review and discussion of the storage facility permit application. In addition, periodic memoranda on changes in environmental regulations are issued by the regional and/or corporate offices and must be read and discussed by branch personnel.

D.4 Training Records

Employee training will be documented. Employees complete a written examination at the conclusion of training. Training records will be maintained onsite.

ATTACHMENT D.2

JOB DESCRIPTIONS

ATTACHMENT D.1

EXAMPLE TRAINING PLAN OUTLINES

ATTACHMENT E

FACILITY DESIGN, WASTE HANDLING, PREPAREDNESS AND PREVENTION PROCEDURES

PREPAREDNESS AND PREVENTION PLAN

ABSTRACT

SECURITY MEASURES--The site is secured as follows:

a. There is a chain link fence with three strands of barbed wire around the facility.

b. Warning signs are posted at all entrances.

c. Locks are on all entrances to the warehouse.

d. Remote controls for all tank operations are inside the secured, fenced area.

e. There is outdoor lighting on sensoring devices and automatically comes on at low light hours of the day

INSPECTION PROCEDURES--See Attachment C for an example Facility Inspection Record and Procedure.

REQUIRED EQUIPMENT--The emergency equipment requirement is met with the following:

a. Internal communications will be by voice.

b. Telephones are available in the warehouse.

c. Fire extinguishers are available next to three exits in the warehouse.

d. Water supplied by the city of Farmington.

E.1 Facility Design

The Farmington service center was designed to minimize the possibility of spills or fires and to minimize the effects of any accidents which may occur. Specifications for the storage facilities, secondary containment and other equipment are in Attachment E and descriptions follow.

E.1.1 Tank Storage

The nominal 12,000 gallon storage tank is 10'6" in diameter and 19' high. It is constructed of 3/16" thick (1/4" thick in the lower third of the tank) carbon steel painted white to reflect sunlight. The tanks are constructed in accordance with Underwriters Laboratories Standard 142 and they are located more than 15 feet from the property line, in accordance with National Fire Protection buffer zone requirements. The secondary containment for the tanks consists of a monolithically poured slab and concrete block dike wall with steel reinforced cement. The secondary containment measures 37 feet by 22 feet by 3 feet and holds 18,266 gallons. The slab is six inches thick and the walls are eight inches thick (nominal). Two 12,000 gallon tanks are located within the containment; one for spent parts washer solvents and one for new parts washer solvents.

The used and product parts washer solvent tanks are equipped with an audio (siren) and visual (strobe light) high level alarm system which will alert employees when the tank is approximately 600 gallons (95%) from being full.

The return and fill station is a concrete block structure with a metal roof and the secondary containment is monolithically poured concrete. The drum washer is tight-piped to the tank with welded joints and all piping is aboveground.

E.1.2 Container Storage Area

The slab, curbing and collection trenches for the container storage area in the warehouse are made of steel-reinforced concrete and the concrete has been poured so that no cracks or gaps exist. The curbing is four inches high and six inches wide and encompasses the storage area except where there is a trench. Steel grates cover the trench to facilitate the movement of containers across it. The concrete on the floor and curbing is coated with a chemical-resistant epoxy and urethane, or equivalent, so as to be impermeable to contain leaks and spills.

The wastes stored in the container storage area are compatible with the containers in which they are stored. The containers used to store wastes meet DOT requirements.

In accordance with 40 CFR 264.73, Safety-Kleen maintains a manifest system, an operating record, biennial reports and all other records required under these sections.

E.2 Waste Management Practices

The Farmington service center was designed to facilitate the handling and storage of the wastes resulting from the services offered by Safety-Kleen. The aboveground storage tanks, drum storage areas and return and fill station have secondary containment and the service center has the equipment necessary for employees to safely manage wastes on-site. Attachment E contains drawings of the waste management facilities.

Spent parts washer solvents are accumulated in a nominal 12,000 gallon aboveground storage tank via the return and fill station. Spent material is poured into the drum washers/dumpsters in the return and fill station, and material is pumped into the used parts washer solvent storage tank. The sediment which accumulates in the bottom of the drum washer/dumpster is removed manually, drummed and stored in the return and fill station according to the satellite accumulation requirements of 40 CFR 262.34(b). The drummed sediment is manifested off-site prior to the expiration of the 90 day time frame for accumulation of hazardous waste. The return and fill station has secondary containment in the form of a 17'6" x 11'2" concrete slab with a 6-inch high curb (730 gallons). The total volume of waste and product will not exceed 10 times the secondary containment volume.

The aboveground tanks have been designed in accordance with NFPA standards and are constructed of carbon steel painted white to reflect sunlight. The secondary containment is a steel reinforced concrete dike measuring 37' x 22' x 3' which holds 18,266 gallons. Two tanks holding a nominal 12,000 gallons each are situated in the diked area; one is for clean and one is for spent parts washer solvents. Each tank is equipped with an audio and visual high level alarm.

The container storage area in the warehouse is used for the storage of (1) spent immersion cleaner, (2) dry cleaning wastes, (3) paint waste, (4) photo imaging waste, and (5) aqueous parts washer solvent. Non-hazardous material, wastes that are not regulated (including transfer wastes) and Safety-Kleen products may also be stored in this area. The wastes in the container storage area are not handled while on site, and are segregated in properly labeled containers to indicate their contents. Incompatible wastes or materials are not anticipated to be stored in the warehouse container storage area. As shown on the site plan in Appendix E, ignitable/flammable wastes are stored at least 50 feet from the property line.

The container storage area has secondary containment in the form of a six inch wide by four inch high steel reinforced concrete curb with a 11.7' x 1.7' x 2.5' (382 gallons) collection trench. No more than 3,820 gallons of spent solvents will be stored in the drum storage area at any time.

Containers used for storage of hazardous waste will meet DOT requirements and will have a maximum capacity of 55 gallons (except for 85 gallon overpack drums). Example specifications for containers used at the service center are provided in Appendix E.

An example of the configuration for storage of containers is shown on the Floor Plan in Attachment E. Proper aisle space will be maintained and the drums will be stored no more than two high. Containers in the drum storage areas will be placed on pallets and moved with a forklift or pallet jack.

E.3 Recordkeeping Requirements

In accordance with 40 CFR 264.73, Safety-Kleen maintains a manifest system, an operating log and biennial reports as described below.

E.3.1 Manifests

Safety-Kleen must implement the manifesting system required under 40 CFR 264.71. If the facility receives hazardous waste accompanied by a manifest, the branch manager or his designate shall do the following:

a. Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest was received;

b. Note any significant discrepancies in the manifest on each copy of the manifest;

c. Within 30 days after the delivery, send a copy of the manifest to the generator;

d. Retain, at the facility, a copy of each manifest for not less than 3 years from the date of delivery. (Safety-Kleen is typically the TSDF as well as the transporter so only one copy is kept on file); and

e. Return a copy of the manifest to the director or his or her designee within a period of 10 days after the end of the month in which the waste was received.

The requirements described above do not apply to hazardous waste produced by generators of more than 100 kilograms but less than 1,000 kilograms in a calendar month if both of the following requirements are met:

a. The waste is reclaimed under a contractual agreement pursuant to which the type and frequency of shipments are specified in the agreement and the vehicle used to transport the waste to the recycling facility and to deliver the regenerated material back to the generator is owned and operated by the reclaimer of the waste; and

b. The generator maintains a copy of the reclamation agreement in his or her files for a period of not less than 3 years after termination or expiration of the agreement.

The facility will not receive bulk shipments of hazardous waste from a rail or water transporter.

When a shipment of hazardous waste is initiated from this facility, the branch manager or his designate must:

a. Prepare a manifest before transporting the waste off-site;

b. Designate on the manifest one facility which is licensed to handle the waste described on the manifest. The branch manager may also designate on the manifest one alternate

facility which is licensed to handle his or her waste if an emergency prevents delivery of the waste to the primary designated facility;

c. Use a transporter who is properly licensed under the act or a generator-owned vehicle licensed under the act to transport the waste; and

d. If the transporter is unable to deliver the hazardous waste to the designated facility or the alternate facility, the generator shall either designate another facility or instruct the transporter to return the waste.

Except as described in the next paragraph, the branch manager shall use a manifest form approved by the director which contains all of the following information:

a. A manifest document number;

b. The generator's name, mailing address, telephone number, and EPA identification number;

c. The name and EPA identification number of each transporter;

d. The name, address, and EPA identification number of the designated facility and an alternate facility, if any;

e. The description of the waste required by regulations of the DOT in the provisions of 49 CFR 172.101, 172.202, and 172.203;

f. The total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle;

g. The hazardous waste number describing the waste;

h. The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations"; and

i. Other certification statements required by the director based on requirements under title II of the solid waste disposal act.

If the facility manifests a shipment of hazardous waste out of state, and if the state to which the shipment is manifested requires the use of another manifest, then the generator shall use that manifest.

The branch manager or designee shall do all of the following when initiating a shipment:

a. Sign the manifest certification by hand;

b. Obtain the handwritten signature of the initial transporter and the date of acceptance on the manifest;

c. Retain one copy for his files;

d. Submit one copy to the director or his or her designee, which shall be postmarked not later than 10 days after the month in which shipment was made; and

e. Give the remaining copies to the transporter.

When Safety-Kleen receives or ships hazardous waste, the branch manager or his designate must review the manifest and check the information on the manifest for correctness. It should be noted that Safety-Kleen prints most of the required information electronically on the majority of its manifests. The employee checking the manifest must review the names, addresses, EPA and New Mexico I.D. and transporter numbers, the manifest document number and the telephone numbers listed. In addition, the hazardous material (HM) box should be checked, the waste description, DOT classification, DOT I.D. number and EPA Waste Code must be verified. The number of containers and pounds, as well as the symbols for these units must be correct and an "H" must be entered in the last column. The generator, transporter(s) and TSDF operator must print and sign their names and enter the date the waste was shipped or received, as appropriate.

Upon discovering a significant manifest discrepancy, the branch manager shall attempt to reconcile the discrepancy with the waste generator or transporter through telephone conversations or otherwise. If the discrepancy is not resolved within 15 days after receiving the waste, the branch manager shall immediately submit, to the director and regional administrator, a letter describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper with the discrepancy. Significant manifest discrepancies are differences between the quantity or type of hazardous waste designated on the manifest or shipping paper and the quantity or type of hazardous waste a facility actually receives, as follows:

a. For bulk waste, significant discrepancies are variations of more than 10% in weight;

b. For batch waste, a significant discrepancy is any variation in piece count, such as a discrepancy of one container in a truckload; and

c. Significant discrepancies in type are obvious differences which can be discovered by inspection or waste analysis, such as waste solvent substituted for waste acid or toxic constituents not reported on the manifest or shipping paper.

E.3.2 Operating Records

The operating record must include:

a. a record of hazardous waste shipments rejected by the facility including the following:
   (1) the name of the generator and transporter,
   (2) the manifest number,
   (3) the date the shipment was rejected, and

(4) the reason for rejection;

b. personal training records for all current personnel; and

c. The contents of the waste storage tank, the quantity of each waste received, and the date each period of accumulation begins (i.e., the date each waste solvent pickup occurs) must also be included in the operating record.

E.3.3 Biennial Reports

A biennial report must be submitted by March 1 of each even numbered year. The biennial report shall be submitted on form 8700-13B. The report shall cover facility activities during the previous calendar year and shall include all of the following information:

a. The EPA identification number, name, and address of the facility.

b. The calendar year covered by the report.

c. For off-site facilities, the EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year, and, for imported shipments, the name and address of the foreign generator.

d. A description and the quantity of each hazardous waste the facility received during the year. For off-site facilities, this information shall be listed by EPA identification number of each generator.

e. The method of treatment, storage, or disposal for each hazardous waste.

f. The most recent closure cost estimate under 40 CFR 264.142.

g. The certification signed by the owner or operator of the facility or the owner or operator's authorized representative.

E.4 Plant Operations: Potential Spill And Fire Sources And Control Procedures

Employees must perform their duties in the safest, most efficient manner possible and the service center has been equipped to facilitate these activities. Containers of product or waste will be moved using a handcart or placed on pallets, and moved with a forklift or pallet jack. Upon arrival at the service center, containers of spent solvent must immediately be added to the storage tank or placed in the container storage area. Open containers of solvent must not be left unattended. Below are descriptions of situations which can result in accidents and the precautions taken to prevent their occurrences.

E.4.1 Potential Minor Spill Sources

The following is a list of activities that have the potential for a minor (one that can be remediated without assistance from a clean up contractor) pollution incident:

a. Pouring of drummed solvent into the drum washer dumpster--As the contents of the containers are poured into the drum washer dumpster, waste can splash out. Employee training emphasizes the importance of taking care in emptying the drums. The return and fill station is underlain by a concrete slab and curbing. This design will contain this type of spill.

b. Filling of containers with solvent product--A low-pressure hose with an automatic shutoff valve, similar to those used at automotive service stations, is used to fill the containers with parts washer solvent. Leaking fittings, a damaged hose or carelessness could lead to spilling the solvent. Manual emergency shut-off valves are on each hose, should the equipment not function properly. In addition, employee training emphasizes the importance of inspection, maintenance and reporting of conditions with pollution incident potential.

c. Moving of containers--When a container is moved, a potential exists for it to tip over. To minimize the potential for spillage of waste, containers must be maintained in an upright position and remain tightly covered while in storage or in transit.

d. Delivery truck transfers--The cargo should be secured in the route vehicle with straps before transport. Individual containers of waste can tip over or be dropped when being moved on or off a delivery truck so transfers will be made using a handcart and a hoist, as necessary.

If a spill does occur, the amount of material in the containers is typically a quantity which can be collected with sorbent clay or pads. Any contaminated soil that results will be removed and shipped to a Safety-Kleen recycle center for proper processing.

E.4.2 Potential Major Spill Source

The following activities have the potential for a major (one for which remedial action will require assistance) pollution incident:

a. Overfilling of storage tanks--Both product and spent solvent tanks can be overfilled with a resulting discharge of material. A high level alarm and daily checks of tank volumes will prevent this type of incident.

b. Leaking pipelines--The pipelines and other equipment present a potential for leaks and resultant pollution. Regular inspection of this equipment and the solvent inventory will detect any leaks.

E.4.3 Potential Fire Sources

The following is a list of fire prevention and minimization measures:

a. All wastes and products are kept away from ignitable sources--Personnel must confine smoking and open flames to remote areas, separate from any solvent (e.g., the office or locker room). The solvent handling area and the aboveground storage tanks are separated from the warehouse building area to minimize the potential for a fire to spread or injury to personnel to occur.

b. Ignitable wastes are handled so that they do not:

(1) become subject to extreme heat or pressure, fire or explosion, or a violent reaction --The solvent waste and other wastes are stored in a tank or in containers, none of which are near sources of extreme heat, fire, potential explosion sources or subject to violent reactions. The tanks are vented and the containers are stored at room temperature to minimize the potential for pressure build up;

(2) produce uncontrolled toxic mists, fumes, dusts or gases in quantities sufficient to threaten human health--The vapor pressure of S-K solvents is low (2 mm) and it is reactive with strong oxidizers only. Toxic mists, fumes, dusts or gases will not form in quantities sufficient to threaten human health since strong oxidizers are not handled at this facility and the solvent vaporization will be minimal under normal working conditions;

(3) produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion--See 'a' above and 'c' below; or

(4) damage the structural integrity of the Safety-Kleen facility--The parts washer solvents or other containerized wastes will not cause deterioration of the tank, containers or other structural components of the facility.

c. Adequate aisle space is maintained to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.

d. "No Smoking" signs are posted in areas where solvents are handled or stored.

e. Fire extinguishers must be checked once per week and tested by the fire extinguisher company once per year.

E.5 Tank Evaluation and Repair Plan

The product and waste solvents stored in the tanks at this facility are compatible with the carbon steel structure. If, during the daily inspection, corrosion is noted on the tank systems, it will be

removed from service and the repaired. If corrosion is significant and localized, the tank will be immediately taken out of service and repaired, (e.g., a patch welded over the corroded area). Should the corrosion of the vessel be extensive or if the tank is found to be leaking, the vessel will be immediately taken out of service and replaced. In the case of a tank which leaks outside of the dike, the facility's contingency plan will be implemented if necessary. Any extensive repairs to the tank system will be assessed and certified by an independent engineer before the system is returned to use.

Each valve, flange, and pump that is associated with the hazardous waste tanks and their ancillary equipment must be marked and listed on the respective air monitoring equipment inventory form. A site drawing (Attachment E) shows the locations and the numbers of the equipment. Compliance with standard 264.1058 (Subpart BB) will be achieved through facility inspections each operating day and if required, leak detection monitoring and repair will be conducted. Records of equipment monitoring and repair are maintained on the inspection form, which is in the facility operating record. If a potential leak is discovered, by visual inspection or excessive odor, it will be noted on the inspection form, repaired immediately or as soon as possible, and not used again until all requirements of 264.196 are satisfied. The leak detection and repair record must be kept in a file at the branch

E.6 External Factors

The design of the facility is such that a harmful spill is highly unlikely to occur from most external factors. The storage tanks are accessible only to Safety-Kleen personnel and the pump switches are located inside the secured fenced area. Also, the container storage area is in a building which is accessible only to Safety-Kleen personnel.

a. Vandalism - Only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the contingency plan.

b. Strikes - A strike would not result in a solvent spill or fire.

c. Power failure - A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease (e.g. pumps will be deactivated).

d. Flooding - The site elevation is above the projected 100-year flood plain; therefore, a 100-year flood will not affect the facility.

e. Storms or Cold Weather – No storm, snow, or other precipitation event will affect the facility.

E.7 Internal And External Communications And Alarm Systems

Because the facility is small, internal communication within the building and the return/fill area is accomplished by voice. An alarm located on the loading dock alerts employees to a potential problem. Telephones will be used to report a spill or a fire and to summon assistance from local and state emergency response agencies. Emergency phone numbers of local and state emergency response teams are posted by each phone located in the office. Included in these phone numbers is the 24-hour telephone number which can be used to contact Safety-Kleen's environmental response coordinators. Releases to the environment will be reported within 24 hours as required by permit condition Module I, Section E.13 and Permit Attachment F, The Contingency Plan.

ATTACHMENT F

CONTINGENCY PLAN

CONTINGENCY PLAN

ABSTRACT

PURPOSE: This plan describes the proper action to be taken by employees during an emergency.

RESPONSIBILITIES: The emergency coordinator or alternate is responsible for implementing the plan during an emergency.

EMERGENCY COORDINATOR: The branch manager is the emergency coordinator. The alternate emergency coordinator is a trained employee designated to this position by the emergency coordinator.

EMERGENCY NOTIFICATIONS:

Farmington Police Department	911 or (505) 334-6622
Farmington Fire Department	911 or (505) 334-1951
San Juan County Regional Medical Center	911 or (505) 325-5011
Safety-Kleen 24-hour Emergency Response	(800) 468-1760
New Mexico Health and Environment Dept.	(505) 827-9329
Rinchem	(505) 345-3655 (505) 883-4242(24 hour central security)
National Response Center	(800) 424-8802

CONTINGENCY PLAN

F.1 Purpose

The contingency plan describes the actions to be taken by each employee in the event of a spill, fire, explosion, or other emergency. It includes the information necessary to address emergency situations efficiently and in such a manner as to prevent or minimize hazards to human health or the environment due to fire, explosion, or any other release of hazardous materials to the air, soil, surface water, or ground water.

The contingency plan is to be implemented whenever there is a release of hazardous material which could threaten human health or the environment. It must be kept at the service center. The branch manager must insure that the contingency plan is updated as necessary.

F.2 Emergency Coordinator Responsibilities

The emergency coordinator is responsible for implementing the contingency plan during an emergency; however, all employees must be familiar with the procedures in this plan and are responsible for proper implementation of the plan should the emergency coordinator or his alternate be unavailable. The branch manager (which may include the resource recovery manager, branch manager, branch automotive manager, etc., or designate) is the emergency coordinator and the alternate emergency coordinator is trained employee designated to this position by the branch manager.

The emergency coordinator and alternate must be familiar with all aspects of this contingency plan, the operations and activities at the facility, the location and characteristics of materials handled, the location of all records within the facility and the facility layout. In addition, these coordinators have the authority to commit the resources necessary to carry out the contingency plan. Their home addresses and telephone numbers, as well as the office telephone number, are listed in Attachment F.1. Also listed in Attachment F.1 are the assigned duties of each employee during an emergency. At least one employee will be at the facility or on call to respond to an emergency situation.

F.2.1 Responsibilities During an Emergency.

Whenever there is an emergency situation that requires implementation of this contingency plan, the emergency coordinator (or alternate when the emergency coordinator is not available) must immediately:

a. activate the internal facility communication system to notify all facility personnel;

b. notify Safety-Kleen's Emergency Response Coordinator using the 24-hour telephone number after working hours - 800/468-1760; and

c. notify appropriate state or local agencies with designated response roles, if necessary.

Whenever there is a release, fire, or explosion, the emergency coordinator must immediately try to identify the character, exact source, amount, and extent of any contamination. Because of the limited number of materials being handled at the facility, he or she may do this by observation or by review of facility records. If necessary, outside laboratories may be contacted to perform chemical analysis.

Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous run-off).

During an emergency, the emergency coordinator must take all measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

F.2.2 Remedial Action Responsibilities

If the environment has been contaminated or there is a potential for contamination as a result of a fire, explosion, or spill, the emergency coordinator must contact Safety-Kleen's Emergency Response Coordinators to report the incident. The treatment, storage and/or disposal of recovered waste, contaminated soil or surface water that results from an emergency situation must be arranged by Safety-Kleen and carried out as expeditiously as possible.

The emergency coordinator must ensure that, in the affected area(s) of the facility:

a. no substance that may be incompatible with the released material is brought on site until cleanup procedures are completed; and

b. all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

F.2.3 Reporting Responsibilities

If the emergency coordinator determines that the facility has had a release that could threaten human health or the environment, the coordinator must report those findings as follows:

a. If the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate authorities.

b. The coordinator must immediately notify the Safety-Kleen Emergency Response Coordinator and the New Mexico Environment Department (NMED) of any spill or

release of hazardous waste within 24 hours (except for spills of one pound or less that are immediately cleaned up). The department will report to NMED the following:

(1) name and telephone number of notifier;

(2) name and address of facility;

(3) time and type of incident (e.g., release, fire);

(4) name and quantity of material(s) involved, to the extent known;

(5) the extent of injuries, if any; and

(6) the possible hazards to human health, or the environment outside the facility.

Safety-Kleen will notify the appropriate state and local authorities that the facility is in compliance with section F.2.2 before operations are resumed in the affected area(s) of the facility.

The emergency coordinator must document the time, date, and details of any incident that requires the implementation of the contingency plan. Within 30 days of the incident, Safety-Kleen will submit a written report on the incident to the New Mexico Environment Department. The report will contain the information set out in Pt. V, 264.196(d)(3) and must include:

a. name, address, and telephone number of the owner or operator;

b. name, address, and telephone number of the facility;

c. date, time, and type of incident (e.g., fire, explosion);

d. name and quantity of material(s) involved;

e. the extent of injuries, if any;

f. an assessment of actual or potential hazards to human health or the environment, where this is applicable; and

g. estimated quantity and disposition of recovered material that results from the incident.

F.2.4 Chain of Command

Based on the emergency response procedures described above, the chain of command during an emergency is as follows:

a. The person who discovers/causes the spill reports to the emergency coordinator; and

b. The emergency coordinator contacts the Safety-Kleen Emergency Response Coordinator and the New Mexico Environment Department.

F.2.5 Government Agencies and Local Authorities to Be Notified

During an emergency, the following government agencies and local authorities may be contacted:

Agency or Authority	Rationale
Police Department	Notify if there is imminent danger to human health.
Fire Department	Notify if there is a fire, explosion, uncontrolled spill, or other imminent danger.
Hospital	Notify if there are any injuries.
NMED	Report releases, fires, and explosions.
Rinchem	Call to assist with remedial action after a release.

Arrangements have been made to familiarize the police department, fire department and local emergency response teams with the layout of the facility, the properties of hazardous materials handled and associated hazards, locations where facility personnel normally work, entrances to and roads inside the facility, and possible evacuation routes. Arrangements have also been made to familiarize the local hospital with the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

F.3 Emergency Response Procedures

Response actions to be taken in specific emergency situations are described in the sections which follow.

F.3.1 Minor Spills

If a spill should occur while pouring spent solvent into a drum washer/dumpster or filling containers with solvent product at the return and fill station, and it is contained in the secondary containment at the base of the return and fill station, remedial action will not be necessary. Should the spill occur outside the containment, different actions must be taken depending on whether the spill occurs on a paved or unpaved area:

a. If the solvent spills on a paved area, it must be collected with sorbent sheets and/or sorbent clay (such as "Oil Dry"). The sorbents will be collected, drummed and shipped to a Safety-Kleen recycle center or other permitted facility for proper treatment and/or disposal.

b. If the solvent spills on an unpaved area, the free solvent must be collected with sorbent material. The sorbent material and any contaminated soil must be collected, drummed and shipped to a Safety-Kleen recycle center or other permitted facility for proper treatment and/or disposal.

If a spill occurs while moving or delivering containers outside of the container storage area, the response actions described in 'a' and 'b' above must be followed. Spills inside the container storage area will be prevented from contaminating the environment by the concrete floor and the secondary containment trenches. In the event of a spill indoors, the doors and windows should be opened to improve the ventilation in the confined area. If solvent is spilled in a non-explosion rated area or is flowing in such, insure that all sources of ignition (e.g., thermostats or light switches) are left in the same position (either on or off) as at the time of the spill. Procedures specified on the appropriate Material Safety Data Sheet (MSDS) will be used to respond to an emergency (example MSDSs are contained in Attachment F.2), the worker will enter the area wearing rubber gloves, aprons, safety glasses, and/or a respirator, collect the liquid, drum it and return it to storage.

Cleanups are completed only when the workers have cleaned themselves and the emergency equipment with soap and water. All minor spills must be reported to the Safety-Kleen Emergency Response Coordinator and the coordinator will contact the New Mexico Environment Department (if the spill is of a reportable quantity).

F.3.2 Major Spills

Any spill which can not be completely remediated using the methods described in 'a' and 'b' of section F.3.1 is a major spill. A major spill is usually the result of a vehicular accident, tank overfilling, equipment failure or a fire. Spilled material which escapes collection can contaminate soil, surface water, ground water, sanitary sewer systems and storm sewer systems. Emergency response to this type of spill should be as follows:

a. Assist any injured people.

b. Stop the flow of materials, if possible.

c. Retain, contain or slow the flow of the materials if it can not be stopped.

d. If solvent escapes containment efforts, immediately call the local Fire Department, and report to the emergency coordinator and the Safety-Kleen Response Coordinator.

e. Immediately recover the spilled solvent to reduce property and environmental damage. Start recovery operations immediately.

The emergency coordinator shall report any incident as soon as possible to Safety-Kleen Emergency Response Coordinator using the 24-hour telephone number, (800) 468-1760. The emergency coordinator shall call an emergency cleanup response contractor, if it is deemed necessary, and report the incident to the National Response Center (telephone: 800/424-8802) and New Mexico Environment Department (telephone: (505) 827-9329 - 24 hour number).

The person reporting a spill should be prepared to give his name, position, company name, address and telephone number. The person reporting should also describe the material spilled and, if possible, some estimate of the amount, and the containment status and specify any equipment needed. Contaminated material resulting from remedial actions for major spills, will usually be disposed of at a properly permitted treatment or disposal facility.

Incidents will be documented and kept on file as part of the operating record. The incidents will be reviewed with branch personnel to prevent similar spills from occurring in the future.

F.3.3 Fire Control Procedures

If a small fire occurs, personnel must act quickly with an appropriately rated fire extinguisher to put out the fire before it spreads. If it can not be extinguished immediately the facility will be evacuated and the fire and police departments will be contacted.

It is Safety-Kleen's policy that personnel only respond to incipient fires; that is, those which can immediately be extinguished using a fire extinguisher. Any fire which cannot be brought under control immediately or which has the potential to become uncontrollable, warrants implementation of the evacuation plan. Ignitable waste at the Farmington facility is stored in specially designed tanks, or in containers in the container storage area.

Safety-Kleen personnel and local authorities must be aware of appropriate response procedures, should a fire occur at the facility. This may include isolating the hazardous area and donning an appropriate positive pressure breathing apparatus.

F.4 Evacuation Plan

Exits are clearly marked in the warehouse and office area. Employees are trained to be aware of all potential escape routes. The facility evacuation plan is included in Attachment F.3.

When an uncontrolled fire or release has occurred, all personnel are to be evacuated from the area and assemble across Hawkins Road to assure that all personnel are accounted for and out of the hazardous area. The fire department must be notified at the time of evacuation either from a safe on-site building or from a neighboring facility.

F.5 Arrangement With Emergency Response Contractors

An emergency response contractor is identified in the Contingency Plan Abstract (Page F-1) and on the Emergency Information Sheet (Attachment F.1). This contractor will provide emergency assistance during a release and/or cleanup.

F.6 Pollution Incident History

There are no records of a pollution incident having occurred at this facility.

F.7 Implementation Schedule

Where a hazard is imminent or an accident has already occurred, remedial action must be taken immediately. The branch manager has the overall responsibility for remediating any discrepancies found during a routine inspection, and will consult with the corporate environmental and engineering staffs to design an implementation schedule.

F.8 Availability And Revision Of The Contingency Plan

This plan and all revisions to the plan are kept at the facility and regularly updated throughout the operating life of the facility. Copies of this document are provided to local authorities and organizations listed on the Emergency Information Sheet (Attachment F.1) and they may be called upon to provide emergency services. In addition, this plan and all revisions to the plan are made readily available to employees working at the facility.

The plan is reviewed and updated, if necessary, whenever:

a. the facility permittee is modified to allow new wastes to be stored or treated, or applicable regulations are revised;

b. the list or location of emergency equipment changes;

c. the facility changes in its design, construction, operation maintenance, or other circumstances in a way that:

   (1) increases the potential for fires, explosions, or releases of hazardous constituents, or

   (2) changes the response necessary in an emergency;

d. the names, addresses, or phone numbers of emergency coordinators change;

e. the employee assigned to each emergency task changes; or

f. the plan fails when implemented in an emergency.

ATTACHMENT F.1

EMERGENCY CONTACT LIST

AND

EMERGENCY EQUIPMENT LIST

ATTACHMENT F.2

MATERIAL SAFETY DATA SHEETS

ATTACHMENT F.3

EVACUATION PLAN

ATTACHMENT G

CLOSURE PLAN

CLOSURE PLAN

ABSTRACT

LOCATION ADDRESS: Safety-Kleen Systems, Inc. (7-008-21)
4210 A Hawkins Road
Farmington, New Mexico 87401

U.S. EPA I.D. NO: NMD 980698849

WASTE UNITS TO UNDERGO CLOSURE:

a. Tank Storage - one 12,000 gallon aboveground storage tank used to store used parts washer solvents.

b. Drum Storage - an area of about 187 square feet with a storage capacity of 3,820 gallons.

c. Return and Fill Station - This waste management unit is used to transfer wastes to the used parts washer solvent tank. It can hold 175 gallons of waste.

The volumes shown above are the maximum amounts which will be stored at this facility.

CLOSURE PLAN

G.1 Purpose

The Farmington service center operates as a storage facility for hazardous wastes. The hazardous waste management units (HWMUs) must be closed in accordance with the closure requirements of 40 CFR 264.110 through 40 CFR 264.115. Closure of the facility HWMUs will be carried out in accordance with this plan. An itemized schedule and closure cost estimate are in Attachment G.1. Safety-Kleen will remediate any hazardous wastes from the facility to a level that is protective of human health and the environment. Upon completion of closure activities, the need for further maintenance will be minimized or eliminated. The facility is expected to close in the year 2050.

The HWMUs, which are subject to closure, are described in the Closure Plan Abstract. The units include one aboveground storage tank system, a return and fill station with drum washers (ancillary equipment) and a container storage area. This closure plan identifies steps necessary to conduct facility closure, or closure of a unit (partial closure) at any point during its intended operation life.

G.2 Aboveground Tanks And Associated Piping

To safely clean and decontaminate the aboveground storage tank (one 12,000-gallon used parts washer solvent tank), the following activities will be performed during partial or final closure (as appropriate):

a. Remove the remaining material from the tank and send the materials to a recycle center, reclaimer or other permitted treatment/disposal facility.

b. Provide access to the tank undergoing closure or decontamination.

c. Pressure wash with detergent solution, scrape, squeegee (if necessary) and triple rinse the tank interior, removing all residual waste material and rinsate.

d. Disconnect and decontaminate all appurtenant piping and pumping equipment.

e. Visually inspect the tank and appurtenant piping, equipment or underlying surfaces for evidence of leakage (i.e., staining and residue).

f. Remove tank, piping and appurtenant equipment for offsite reuse or sell as scrap. The tank may also remain onsite for reuse (if applicable for partial closure).

g. Transport and properly dispose or treat waste material generated during closure.

During closure of the tank system, Safety-Kleen will remove or decontaminate waste residues, contaminated system components, contaminated soils, structures and equipment contaminated

with waste, and manage these materials as hazardous waste, unless determined to be non-hazardous. The procedures for tank decontamination and/or partial or final closure are described below.

G.2.1 Removal of Waste Material and Opening of the Tank

The contents of the tank must be removed using a pump, vacuum or similar equipment and then be shipped to a recycle center, reclaimer or other permitted treatment/disposal facility. To gain access, the manway at the bottom of the tank will be used. Depending on the type of opening and the condition of the equipment, a variety of tools may be used to open the manway. Care must be exercised to minimize spark generation when working on the tank.

Prior to entering the tank, personnel should have appropriate protective respiratory protective equipment and protective clothing. Once the tank has been opened, it must be provided with positive ventilation. The tank will then be inspected to determine the approximate quantity and physical conditions of any residual waste material, as well as the integrity of the tank system.

Procedures for purging or venting tanks are described in API, RP1604 “Removal and Disposal of Used Petroleum Storage Tanks” and OSHA “Permit Required Confined Spaces” (29 CFR 1910.146). The contractor will monitor vapors to ensure the tank atmosphere has combustible gas concentrations of less than 10% of the lower explosive limit (LEL).

G.2.2 Removal of Residual Waste and Cleaning of Tank

The method used to remove the residual waste material from the tank will depend on the physical properties and quantities of that material. Prior to any person entering the tank, an effort will be made to remove as much liquid and sediment as possible (see section G.2.1).

Subsequent to removing the majority of the material from the tank, the tank interior will be washed using a high-pressure wash system and a detergent-water solution to decontaminate the walls, roof, and floor of the tank. The tank interior will then be rinsed with tap water. The wash/rinse water will be collected and shipped to a recycle center, reclaimer or other permitted treatment/disposal facility. The quantity of wash/rinse water will be kept to a minimum to limit the amount of waste material.

Similar procedures will be implemented to remove residual wastes and decontaminate the tank piping and ancillary equipment. The piping will be decontaminated with a detergent-water solution, rinsed with tap water, and either reused or removed and cut into manageable sized pieces for disposal as scrap.

Storage tanks are considered confined spaces (i.e. spaces open or closed having a limited means of egress in which poisonous gases or flammable vapors might accumulate or an oxygen deficiency might occur), and confined space entry requires special procedures. Confined space entry will be conducted in accordance with 29 CFR 1910.146. Tank entry procedures will be specified in the site health and safety plan. In all cases, personnel performing closure activities must have completed 40-hour OSHA hazardous waste training requirements (29 CFR 1910.120).

G.2.3 Removal of the Tank

Following removal of wastes and decontamination activities, the tank may be reused onsite (partial closure) or at an offsite location, or scrapped. If the tank is to be transported offsite or scrapped, the following procedures will be observed to safely remove the tank:

a. Disconnect all appurtenant piping.

b. Disconnect all appurtenant pumping equipment.

c. If the tank is to be scrapped, the tanks and equipment will be removed and recycled in accordance with 40 CFR 261.1(c)(6) and (7). Verification of destruction will be provided by the contractor or scrap metal facility.

d. If the tank is to be reused following decontamination, the final rinsate will be sampled. The rinsate sample will be analyzed for volatile organic compounds. If the total volatile organic compound concentration is less than 1mg/L, the tank will be considered properly decontaminated. If the results are greater than 1 mg/L, the decontamination procedures will be re-performed.

G.2.4 Tank Containment Area Decontamination

Following decontamination and removal of the aboveground tank and piping, the concrete slab containment area will be inspected by an independent registered Professional Engineer (or designate). The inspection will document whether any waste related staining or lapses in the tank secondary containment system exist that may have allowed the potential for waste to migrate to underlying soils and/or groundwater. In the absence of waste related staining and/or lapses of integrity, further evaluation of the potential for wastes to impact human health or the environment will not be considered necessary to complete closure.

The tank containment area will be decontaminated with a detergent water solution and triple rinsed. Any through-going cracks or gaps in the containment slab observed during the inspection will be sealed prior to washing to prevent wash water from migrating to underlying soils. The wash/rinse water will be containerized and managed as a hazardous waste.

If the containment area is to remain in place at closure, a sample of the final rinsate will be collected and analyzed for VOCs. If total VOC concentrations are less than 1 mg/L, the containment area will be considered properly decontaminated. If total VOCs are detected above 1 mg/L, the containment area will be re-cleaned and sampled.

If the containment area will be removed at closure, a rinsate sample will not be collected. The diked walls and concrete slab will then be excavated, loaded and transported for disposal at a concrete recycler (or similar) for disposal. The excavation will be filled with clean backfill (if necessary) and graded to match ground level.

G.3 Container Storage Area

The container storage area is used for the storage of containers of used immersion cleaner, dry cleaning waste, paint waste, or other non-regulated wastes or products. At closure, all the contents of the containers will be removed and transported to an appropriate permitted hazardous waste management facility after proper packaging, labeling and manifesting.

The concrete floor and containment trenches will be high-pressure cleaned with a detergent-water solution and triple rinsed with tap water. The final rinsate will be sampled and analyzed for volatile organic compounds to determine the effectiveness of the cleaning. If the total volatile organic compound level is less than 1 mg/L, the container storage area will be considered properly decontaminated. If the results are greater than 1 mg/L, the decontamination procedures will be re-performed. All rinsate wastes from the container storage area closure process will be reclaimed or properly treated at a permitted facility.

Following decontamination of the container storage area, the containment area will be inspected by an independent registered Professional Engineer (or designate). The inspection will document any potential lapses of integrity that may have allowed potential migration of wastes outside the containment area. In the absence of any waste related staining and/or lapses of integrity, further evaluation of the potential for wastes to impact human health or the environment will not be necessary.

G.4 Solvent Return And Fill Station

The return and fill station is used to collect and return the used solvents to the waste storage tank and to dispense clean solvents into containers. At closure, the sediment in the drum washer/dumpster will be removed, containerized, labeled, and manifested for proper treatment and/or disposal through a Safety-Kleen Recycling Center, reclaimer or other treatment/disposal facility.

The drum washer(s), containment area and the dock structure will be washed with a detergent solution and rinsed. The rinsate may either be discharged through the appurtenant piping system into the storage tank (prior to cleaning and removing the storage tank), or contained within separate containers, vacuum truck or other appropriate storage device. The clean drum washer/dumpster and dock structure will be staged for reuse or scrapped. Wastes generated during closure of the return and fill structure will be transported to a permitted hazardous waste facility.

If the return and fill dock structure or drum washers will be reused, a sample will be collected of the final rinsate. If the return and fill station and/or components will be scrapped during closure, rinsate samples will not be collected. The concrete containment slab and curbing will also be decontaminated with a detergent-water solution, high-pressure spray and triple rinsed with tap water. A sample will be collected of the final rinsate. The rinsate sample(s) will be analyzed for volatile organic compounds. If the total volatile organic compound concentration is less than 1 mg/L, the components will be considered properly decontaminated. If the results are greater

than 1 mg/L, the decontamination procedures will be re-performed.

Following decontamination, the secondary containment structure will be inspected by an independent registered Professional Engineer (or designate). The inspection will document any potential lapses of integrity that may have allowed potential migration of wastes outside the containment area. In the absence of waste related staining and/or lapses of integrity, further evaluation of the potential for wastes to impact human health or the environment will not be necessary.

G.5 Soil Sampling

If the results of the inspections for the HWMUs indicate lapses of integrity exist in the secondary containment system(s) that may have allowed the potential for waste to migrate to underlying soils, soil samples may be collected. If the inspection indicates no lapses of integrity, soil samples will not be necessary to complete closure.

If determined to be necessary based on the inspections of the HWMUs, soil samples will be collected from immediately beneath the concrete slab or containment area. Soil samples will be analyzed for volatile organic compounds, semivolatile organic compounds and metals (cadmium, chromium and lead). If constituents are detected, the concentrations may be compared to appropriate risk-based screening levels to determine whether the HWMU(s) may be closed.

G.6 Facility Closure Schedule And Certification

Within 90 days of receiving the final volume of hazardous wastes, Safety-Kleen will remove all hazardous wastes from the site in accordance with the approved closure plan. The New Mexico Environment Department may approve a longer period if Safety-Kleen demonstrates that the activities required to comply with this paragraph will, of necessity, take longer than 90 days to complete or the following requirements are met:

a. the facility has the capacity to receive additional wastes;

b. there is a likelihood that a person other than Safety-Kleen will recommence operation of the site; and/or

c. closure of the facility is incompatible with continued operation of the site. In this case, Safety-Kleen will take all steps necessary to prevent threats to human health and the environment.

Safety-Kleen will complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes. When closure is completed, Safety-Kleen shall submit to NMED certification, both by the operator and by an independent registered

professional engineer, that the facility has been closed in accordance with the approved closure plan and 40 CFR 264.115.

ATTACHMENT G.1

CLOSURE SCHEDULE AND ESTIMATED CLOSURE COSTS

ATTACHMENT G.2

CERTIFICATE OF LIABILITY INSURANCE

ATTACHMENT H

FINANCIAL LIABILITY DOCUMENTS

ATTACHMENT E.1

FACILITY DRAWINGS

ATTACHMENT E.2

TANK SYSTEM CERTIFICATION

ATTACHMENT E.3

CONTAINER STORAGE AREA CERTIFICATION

ATTACHMENT C.1

EXAMPLE INSPECTION FORMS

ATTACHMENT C.2

SAFETY-KLEEN SUBPART CC COMPLIANCE PLAN

ATTACHMENT C.3

EQUIPMENT INVENTORY FOR INSPECTIONS